

Colorado Home and Community Based Services Community Mental Health Services Transition Plan

Action Item	Start Date	Projected End Date/Completed Date	Key Stakeholders	Progress/Status
Program Component: Stakeholder Engagement and Oversight				
Action Item: Convene an interagency group to manage the transition planning process for CMHS waiver.	Start Date: 5/21/2014	Completed: 06/01/2014	Key Stakeholders: Colorado Department of Health Care Policy and Financing (The Department), The Lewin Group	Progress/Status: Interagency team developed and meeting weekly.
Action Item: Develop a communication strategy to manage the public input required by the rule as well as ongoing communication on the implementation of the transition plan. Adapt the strategy to different audiences (e.g. SEPs and providers).	Start Date: 7/10/2014	Completed: 7/30/2014	Key Stakeholders: The Department	Progress/Status: Ongoing communication with stakeholders and other community partners.
Action Item: Reach out to CMHS providers and provider associations to increase the understanding of the rule and maintain open lines of communication.	Start Date: 6/30/2014	Projected End Date: 3/15/2019	Key Stakeholders: The Department, Single-Entry Point Agencies (SEPs), private case management agencies, Assisted Living Residences, Mental Health Centers, BHO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Colorado Department of Public Health and Environment (CDPHE), Residential Care Collaborative, Policy Advisory Committee (PAC), Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, National Alliance on Mental Illness, Colorado Assisted Living Association, and other organizations as identified.	Progress/Status: Discussion in provider meetings, advisory committees, stakeholder meetings/communications. Self survey out to providers on 6/30/2014, in process of analyzing data.
Action Item: Create a space on an existing state website to post materials related to CMHS-HCB settings.	Start Date: 7/10/2014	Completed 07/10/2014	Key Stakeholders: The Department	Completed
Action Item: Develop and issue required public notices. Collect CMHS related comments and summarize for incorporation in the transition plan and within communication tools (e.g. FAQs).	Start Date: 7/30/2014	Projected End Date: 9/30/2015	Key Stakeholders: The Department, Single-Entry Point Agencies (SEPs), private case management agencies, Assisted Living Residences, Mental Health Centers, BHO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Colorado Department of Public Health and Environment (CDPHE), Residential Care Collaborative, Policy Advisory Committee (PAC), Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, National Alliance on Mental Illness, Colorado Assisted Living Association, and other organizations as identified.	Progress/Status: Initial public comment completed-30day noticing on 9/10/2014. Incorporated additional 7 items per CMS request on 7/1/2015 and will re-public notice.

Action Item: Continue ongoing stakeholder engagement surrounding Supported Employment Services and similar programs for the CMHS waiver.	Start Date: 5/22/2014	Projected End Date: 3/19/2019	Key Stakeholders: The Department, Single-Entry Point Agencies (SEPs), private case management agencies, Assisted Living Residences, Mental Health Centers, BHO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Colorado Department of Public Health and Environment (CDPHE), Residential Care Collaborative, Policy Advisory Committee (PAC), Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, National Alliance on Mental Illness, Colorado Assisted Living Association, and other organizations as identified.	Progress/Status: Ongoing discussions around Supported Employment occur with the Department Stakeholders. Currently identifying areas of concern.
Action Item: Develop and update on a regular basis an CMHS external stakeholder communication plan.	Start Date: 9/30/2014	Projected End Date: 3/15/2019	Key Stakeholders: The Department, Single-Entry Point Agencies (SEPs), private case management agencies, Assisted Living Residences, Mental Health Centers, BHO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Colorado Department of Public Health and Environment (CDPHE), Residential Care Collaborative, Policy Advisory Committee (PAC), Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, National Alliance on Mental Illness, Colorado Assisted Living Association, and other organizations as identified.	Progress/Status: Continue communication through stakeholder and provider committees/meetings. Meetings held every other month. Need to develop an email blast to all providers/stakeholders.
Program Component: Infrastructure				
1. Review of existing HCBS residential and non-residential settings				
Action Item: Assessment of settings where participants receive services and where they live	5/21/2014	Completed: 6/30/2014	The Department, The Lewin Group	Progress/Status: Completed-Assessment of settings where participants receive services and where they live.
Action Item: Conduct a review of Colorado regulations and supporting documents for the HCBS-CMHS waiver programs with residential and non-residential settings.	Start Date: 5/21/2014	Completed: 6/30/2014	Key Stakeholders: The Department, The Lewin Group	Completed
Action Item: Prepare a matrix and report outlining recommendations for CMHS waiver	Start Date: 6/1/2014	Completed: 6/30/2014	Key Stakeholders: The Department, The Lewin Group	Completed
Action Item: Create a two level provider survey process for the HCBS-CMHS waiver program.	Start Date: 5/21/2014	Completed: 5/01/2015	Key Stakeholders: The Department, The Lewin Group	Completed
Action Item: 1. Level 1 macro review of CMHS provider settings (Surveying of existing providers)	Start Date: 6/30/2014	Completed: 7/14/2014	Key Stakeholders: The Department, The Lewin Group	Completed
Action Item: 2. Level 2 micro review of CMHS provider settings based on the results of Level 1(Site visit to verify survey data)	Start Date: 12/1/2014	Completed: 5/01/2015	Key Stakeholders: The Department, The Lewin Group	Completed
Action Item: Outcome of level 1 and level 2 survey process review of provider settings	Start Date: 5/1/2015	Completed: 7/1/2015	The Department, The Lewin Group	Progress/Status: All data outcomes of provider compliance have been compiled and added to the provider score card. Currently being reviewed by the Department.

Action Item: Develop a survey for individuals and families to provide input on HCBS-CMHS settings by type and location.	Start Date: 2/1/2015	Completed: 5/01/2015	Key Stakeholders: The Department, The Lewin Group	Progress/Status: Completed- currently reviewing data
Action Item: Outcome of survey for individuals and families	Start Date: 5/1/2015	Projected End Date: 3/19/2019 and ongoing	The Department, The Lewin Group, individual clients, and families	Progress/Status: The survey will be ongoing for all individuals and families to take as often as needed as it pertains to their individual needs/person centered care. The Department will push out the survey on a quarterly basis to remind individuals and families. The Department and the Lewin Group will gather data quarterly and provide a summary report.
Action Item: Prepare a list of CMHS settings that do not meet the residential and non-residential requirements, may meet the requirements with changes, and settings Colorado chooses to submit under CMS heightened scrutiny.	Start Date: 4/1/2015	Projected End Date: 7/01/2015	Key Stakeholders: The Department, Single-Entry Point Agencies (SEPs), private case management agencies, Assisted Living Residences, Mental Health Centers, BHO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Colorado Department of Public Health and Environment (CDPHE), Residential Care Collaborative, Policy Advisory Committee (PAC), Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, National Alliance on Mental Illness, Colorado Assisted Living Association, and other organizations as identified.	Progress/Status: Currently the Department has a list of providers that vary in compliance levels. The Department is analyzing the data and preparing a list of settings that do not meet setting requirements to submit to CMS under heightened scrutiny.
2. Modifications to Licensure and Certification rules and operations				
Action Item: Assessment and Outcomes of settings within licensure and certification process (provider enrollment).	Start Date: 4/1/2015	Projected End Date: 1/1/2017	Key Stakeholders: The Department, Single-Entry Point Agencies (SEPs), private case management agencies, Assisted Living Residences, Mental Health Centers, BHO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Colorado Department of Public Health and Environment (CDPHE), Residential Care Collaborative, Policy Advisory Committee (PAC), Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, National Alliance on Mental Illness, Colorado Assisted Living Association, and other organizations as identified.	Progress/Status: Currently gathering data, evaluating and discussing with CDPHE.
Action Item: Incorporate the outcomes of the assessment of HCBS-CMHS settings within existing licensure and certification processes to identify existing settings as well as potential new settings in development that may not meet the requirements of the rule.	Start Date: 1/1/2016	Projected End Date: 1/1/2017	Key Stakeholders: The Department, Single-Entry Point Agencies (SEPs), private case management agencies, Assisted Living Residences, Mental Health Centers, BHO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Colorado Department of Public Health and Environment (CDPHE), Residential Care Collaborative, Policy Advisory Committee (PAC), Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, National Alliance on Mental Illness, Colorado Assisted Living Association, and other organizations as identified.	Progress/Status: Currently gathering data, evaluating and discussing with CDPHE.

Action Item: Work with the Division of Housing to develop a template leases, written agreements or addendums to support providers in documenting protections and appeals comparable to those provided under Colorado landlord tenant law. Ensure that written language describes the required environment to comply such as locked doors and use of common areas.	Start Date: 5/1/2016	Projected End Date: 12/01/2016	Key Stakeholders: The Department, Single-Entry Point Agencies (SEPs), private case management agencies, Assisted Living Residences, Mental Health Centers, BHO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Colorado Department of Public Health and Environment (CDPHE), Residential Care Collaborative, Policy Advisory Committee (PAC), Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, National Alliance on Mental Illness, Colorado Assisted Living Association, Colorado Division of Housing, Colorado Legal Services	Progress/Status: Currently working with DOH, stakeholders, and CDPHE in discussing options and implementation.
Action Item: Analyze and include additional requirements to certification standards, processes and frequency of review in order to comply with the new HCBS settings rule.	Start Date: 4/1/2015	Projected End Date: 3/15/2019	Key Stakeholders: The Department, Single-Entry Point Agencies (SEPs), private case management agencies, Assisted Living Residences, Mental Health Centers, BHO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Colorado Department of Public Health and Environment (CDPHE), Residential Care Collaborative, Policy Advisory Committee (PAC), Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, National Alliance on Mental Illness, Colorado Assisted Living Association, and other organizations as identified.	Progress/Status: Currently working with stakeholders and CDPHE to update the certification standards and frequency of review.
3.Modifications to enrollment/re-enrollment procedures				
Action Item: Strengthen enrollment and re-enrollment procedures to identify HCBS-CMHS settings that may have indicators of non-compliance and require more thorough review.	Start Date: 11/1/2015	Projected End Date: 03/01/2017	Key Stakeholders: The Department, Single-Entry Point Agencies (SEPs), private case management agencies, Assisted Living Residences, Mental Health Centers, BHO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Colorado Department of Public Health and Environment (CDPHE), Residential Care Collaborative, Policy Advisory Committee (PAC), Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, National Alliance on Mental Illness, Colorado Assisted Living Association, and other organizations as identified.	
Action Item: Strengthen language within enrollment and re-enrollment sections of the waivers and regulations to support a review of “informed” choices and decision-making across the settings requirements including the process for mitigating any restrictions in rights.	Start Date: 11/1/2015	Projected End Date: 3/15/2019	Key Stakeholders: The Department, Single-Entry Point Agencies (SEPs), private case management agencies, Assisted Living Residences, Mental Health Centers, BHO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Colorado Department of Public Health and Environment (CDPHE), Residential Care Collaborative, Policy Advisory Committee (PAC), Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, National Alliance on Mental Illness, Colorado Assisted Living Association, and other organizations as identified.	
4. Revisions to HCBS waiver applications and Colorado regulations				

Action Item: Determine whether state regulations, policies and/or legislation are in compliance and target dates for changes.	Start Date: 12/1/2015	Projected End Date: 6/30/2016	Key Stakeholders: The Department, Single-Entry Point Agencies (SEPs), private case management agencies, Assisted Living Residences, Mental Health Centers, BHO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Colorado Department of Public Health and Environment (CDPHE), Residential Care Collaborative, Policy Advisory Committee (PAC), Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, National Alliance on Mental Illness, Colorado Assisted Living Association, and other organizations as identified.	Progress/Status: Currently the Department has a list of suggested rule and language changes and will further analyze the data to put together a timeline for implementing changes.
Action Item: Explore the HCBS-CMHS waiver and potentially add participant rights within regulations consistent across all services when applicable.	Start Date: 11/1/2015	Projected End Date: 3/15/2019	Key Stakeholders: The Department, Single-Entry Point Agencies (SEPs), private case management agencies, Assisted Living Residences, Mental Health Centers, BHO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Colorado Department of Public Health and Environment (CDPHE), Residential Care Collaborative, Policy Advisory Committee (PAC), Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, National Alliance on Mental Illness, Colorado Assisted Living Association, and other organizations as identified.	
Action Item: Modify waivers and regulations to ensure participant choice and strengthen participant protections.	Start Date: 11/1/2015	Projected End Date: 3/15/2019	Key Stakeholders: The Department, Single-Entry Point Agencies (SEPs), private case management agencies, Assisted Living Residences, Mental Health Centers, BHO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Colorado Department of Public Health and Environment (CDPHE), Residential Care Collaborative, Policy Advisory Committee (PAC), Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, National Alliance on Mental Illness, Colorado Assisted Living Association, and other organizations as identified.	
Action Item: Require staff training on HCB settings requirements, PCP philosophy and practice.	Start Date: 3/1/2015	Projected End Date: 3/15/2019	Key Stakeholders: The Department and SEP's	Progress/Status: Webinar trainings have been administered for all stakeholders involving: HCB Settings requirements, and person centered planning philosophy and practice. Training for all staff will be ongoing.
Action Item: Provide clarity on the need for all residential settings to comply with home and community based settings requirements.	Start Date: 3/1/2015	Projected End Date: 12/01/2015, and ongoing	Key Stakeholders: The Department, The Lewin Group	Progress/Status: Webinar trainings have been administered for all stakeholders involving: person centered planning, and clarification regarding the final rule for residential and non-residential settings.

Action Item: Expand community integration opportunities for CMHS participants using adult day health and include desired outcomes and required provisions within regulations.	Start Date: 11/1/2015	Projected End Date: 3/15/2019	Key Stakeholders: The Department, Single-Entry Point Agencies (SEPs), private case management agencies, Assisted Living Residences, Mental Health Centers, BHO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Colorado Department of Public Health and Environment (CDPHE), Residential Care Collaborative, Policy Advisory Committee (PAC), Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, National Alliance on Mental Illness, Colorado Assisted Living Association, and other organizations as identified.	
Action Item: Modify quality assurance documents to meet HCBS rule requirements and delete references to “non-integrated work services programs provide paid work in sheltered/segregated settings”.	Start Date: 11/1/2015	Projected End Date: 3/15/2019	Key Stakeholders: The Department and SEP's	
5.Enhancing training and technical assistance	1/1/2015			
Action Item: Conduct a webinar series to highlight the settings requirements (residential, non-residential).	Start Date: 1/1/2015	Completed: 6/30/2015	Key Stakeholders: The Department, Single-Entry Point Agencies (SEPs), private case management agencies, Assisted Living Residences, Mental Health Centers, BHO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Colorado Department of Public Health and Environment (CDPHE), Residential Care Collaborative, Policy Advisory Committee (PAC), Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, National Alliance on Mental Illness, Colorado Assisted Living Association, and other organizations as identified.	Progress/Status: Webinar trainings have been administered to all stakeholders involving: person centered planning, clarification regarding the final rule for residential and non-residential settings.
Action Item: Provide strategic technical assistance to all key stakeholders by issuing fact sheets, FAQ's and responding to questions related to the implementation of the HCBS-CMHS transition plan (action steps, timelines, and available technical assistance).	Start Date: 8/1/2014	Completed: 6/30/2015 and ongoing	Key Stakeholders: The Department, The Lewin Group	Progress/Status Completed-will continue to update living document. Will be posted to the Department's external website.
Action Item: Provide training to licensure/certification staff on new HCBS-CMHS settings requirements.	Start Date: 1/1/2016	Projected End Date: 11/1/2018	Key Stakeholders: The Department, The Lewin Group, CDPHE	
Action Item: Provide training to quality improvement system on new HCBS-CMHS settings outcomes measures.	Start Date: 1/1/2017	Projected End Date: 11/1/2018	Key Stakeholders: The Department, The Lewin Group, CDPHE	
Action Item: Provide training to enrollment staff to heighten scrutiny of new HCBS-CMHS providers/facilities.	Start Date: 1/1/2016	Projected End Date: 11/1/2018	Key Stakeholders: The Department, The Lewin Group, CDPHE	
Action Item: Develop and include ongoing provider training on rights, protections, person-centered thinking, and community inclusion.	Start Date: 3/1/2015	Projected End Date: 3/15/2019 and ongoing	Key Stakeholders: The Department, The Lewin Group, CDPHE	Progress/Status: Webinar trainings have been administered to all stakeholders involving: person centered planning, clarification regarding the final rule for residential and non-residential settings.

Action Item: Provide training to CMHS case managers through SEPs and County Department of Social Services to support an “informed” choice of setting, identify areas of non-compliance and support implementation of the transition plan.	Start Date: 1/1/2017	Projected End Date: 1/1/2017	Key Stakeholders: The Department, SEPs, DSS	Progress/Status: Webinar trainings have been administered to all stakeholders involving: person centered planning, clarification regarding the final rule for residential and non-residential settings.
Program Component: Inclusion of Requirements within the HCBS Quality Framework				
Action Item: Include outcomes measures on settings within the current 1915c waiver quality improvement system.	Start Date: 6/1/2017	Projected End Date: 1/01/2018	Key Stakeholders: The Department, CDPHE	
Action Item: Develop a HCBS-CMHS provider scorecard.	Start Date: 10/1/2014	Completed: 7/1/2015	Key Stakeholders: The Department, HCBS Providers, CDPHE, Communication Department	Completed
Action Item: Monitor data from Quality of Life and NCI related to outcomes (e.g. opportunities for “informed” choice, choice of roommate and setting, freedom from coercion).	Start Date: 1/1/2016	Projected End Date: 3/15/2019	Key Stakeholders: The Department	
Action Item: Monitor person-centered integrated employment requirements through a routine review of data to measure effectiveness of supports.	Start Date: 6/1/2017	Projected End Date: 3/15/2019	Key Stakeholders: The Department, CDPHE	
Action Item: Formal annual progress review and update of HCBS-CMHS transition plan.	Start Date: 8/1/2015	Projected End Date: 3/15/2019. Monthly update and annual review	Key Stakeholders: The Department, The Lewin Group	Progress/Status: Last updated 7/7/2015
Action Item: Review survey cycles for HCBS-CMHS providers.	Start Date: 6/1/2016	Projected End Date: 7/01/2018	Key Stakeholders: The Department, CDPHE	
Program Component: Managing Provider Transition Plans				
Action Item: Develop a transition plan approval process which requires the provider to submit progress reports on the implementation of requirement for HCBS settings.	Start Date: 11/1/2016	Projected End Date: 11/1/2017	Key Stakeholders: The Department, SEPs, CDPHE	
Action Item: Include ongoing updates within the HCBS-CMHS provider scorecard.	Start Date: 8/1/2015	Projected End Date: 3/15/2019	Key Stakeholders: The Department, SEPs, CDPHE, and interested parties.	Progress/Status: Provider scorecards will be updated quarterly.
Action Item: Develop remedial strategies for providers who are not able to meet requirements	Start Date: 12/1/2015	Projected End Date: 5/1/2017	Key Stakeholders: The Department, The Lewin Group, CDPHE	Progress/Status: The Department along with the Lewin Group has developed a protocol and draft template for managing non-compliance with the HCB Settings Rule.
Action Item: Ongoing Monitoring for areas needing remediation	Start Date: 6/1/2018	Projected End Date: 3/15/2019 and ongoing	The Department, The Lewin Group, CDPHE	

Action Item: Develop a process for helping individuals to transition to new HCBS-CMHS settings as appropriate.	Start Date: 1/1/2017	Projected End Date: 11/01/2018	Key Stakeholders: The Department, Single-Entry Point Agencies (SEPs), private case management agencies, Assisted Living Residences, Mental Health Centers, BHO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Colorado Department of Public Health and Environment (CDPHE), Residential Care Collaborative, Policy Advisory Committee (PAC), Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, National Alliance on Mental Illness, Colorado Assisted Living Association, and other organizations as identified.	
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